

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

STATE OF MISSOURI et al.,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., et al.,

Defendants.

Case No. 4:21-CV-01300

**DECLARATION OF
KRAIG PAULSEN**

I, Kraig Paulsen, declare under penalty of perjury that I have personal knowledge of the following:

1. I am a resident of Iowa and over the age of majority.
2. I serve as the Interim Director of the Iowa Department of Management, an officer of the State of Iowa appointed by Iowa Governor Kim Reynolds. My duties as Interim Director under chapter 8 of the Iowa Code include leading the Department of Management, managing the budget for the government of the State of Iowa, and effectively controlling the financial operations of the government of the State of Iowa.
3. Agencies of the State of Iowa, including the Iowa Alcoholic Beverages Division, Iowa Workforce Development, Iowa Department for the Blind, Iowa Department of Corrections, Judicial District Departments of Correctional Services, and state universities governed by the Iowa Board of Regents currently have federal and contracts and subcontracts.
4. The Regents institutions alone—the University of Iowa, Iowa State University, and University of Northern Iowa—have more than \$1.3 billion in such

contracts. For context, the entire Regents annual budget in the current fiscal year, including other institutions and the University of Iowa Hospitals and Clinics, is only \$6.4 billion.

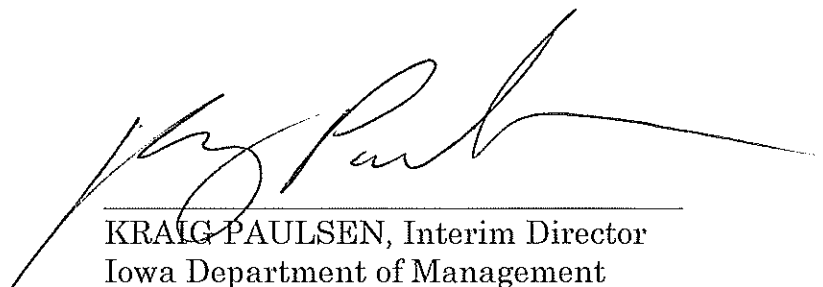
5. Already, at least six modifications of federal contracts have been presented to the University of Iowa adding language mandating the University to comply with the Contractor Vaccine Mandate. The University signed these contracts between October 14, 2021, and October 28, 2021, because it concluded that it could not put at risk the more than \$91 million value of the contracts.

6. In addition, a \$292 million federal contract covering the Ames Laboratory at Iowa State University was unilaterally modified by the United States Department of Energy to incorporate the Contractor Vaccine Mandate.

7. Many other Iowa state agencies also receive federal funds or have related agreements with federal agencies. It is unclear which, if any, of these agencies may also be asked or forced to adopt the Contractor Vaccine Mandate.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 4, 2021.



KRAIG PAULSEN, Interim Director
Iowa Department of Management